



September 17, 2020

Seattle Department of Construction and Inspections
ATTN: Public Resource Center
700 Fifth Ave, Ste. 200
Seattle, WA 98124
Via email to prc@seattle.gov

RE: Comments on Scope of Environmental Impact Statement for Project 3030811-LU

To Whom it May Concern:

Thank you for the opportunity to comment on the scope of the EIS for project number 3030811-LU at the Talaris/Battelle site. We indicated our concern about this project in February 2020 due to the extraordinarily high level of tree removal proposed for this project.

We request that you consider the following in the scope of the project's EIS:

Significant, unavoidable adverse impacts:

- **Impacts to birds and wildlife from habitat alteration:** Tree removal, increased imperviousness, additional traffic, other alterations and human activity will have unavoidable impacts on the ecology of the project site itself and beyond its property lines. Impacts to wildlife should be assessed on a species by species basis. Dozens of bird species, including nesting Bald Eagles, have been observed at the site, each with its own niche, needs, and consideration. The project site also needs to be considered within the context of the greater area. The wooded areas of the site form part of a relatively well-connected corridor of urban canopy, extending from Lake Washington and the Union Bay Natural Area, north along the Burke Gilman Trail and Magnuson Park and into the Matthews Beach Park area. Habitat corridors are critical for migratory birdlife.
- **Impacts to birds from lighting and glass:** Bird-window collisions kill up to one billion birds each year in the United States (Loss et al. 2014), making glass the second greatest human-related hazard that directly kills birds. Unshielded nighttime lighting can also contribute to bird mortality events at windows (Gauthreux & Belser 2005). Structures four stories and lower with nearby vegetation appear to be most hazardous to birds (Hagar et al. 2017). Please evaluate how alternatives will contribute to bird mortality events through window collisions and increased nighttime lighting. [Bird-safe building designs](#) (Sheppard 2011) can reduce bird-window collision risks. Lighting should be low profile and not reflect upwards and bird safe windows can minimize bird fatalities and add a creativity to building design. There are also energy efficiency and human comfort benefits from bird-safe building design including reduced solar heat gain and glare reduction.
- **Impacts to water quality from stormwater runoff:** The project site sits in the southeast corner of the North Union Bay combined sewer overflow basin. Increased imperviousness and fewer trees and vegetation will increase stormwater runoff into Union Bay. Please evaluate how stormwater will

behave under extreme precipitation, how the alternatives may contribute to CSO events, and the setbacks alternatives could cause to the [RainWise | 700,000,000 Gallons](#) campaign.

- **Impacts to habitat and future mitigation efforts from overhead and buried utilities:** Please evaluate how buried and overhead utilities will impact the site and surrounding habitat areas, as well as the feasibility of future on-site mitigation efforts. For example, overhead utilities limit the size of trees that can be planted beneath them and buried utilities can exclude the possibility of tree planting altogether. Please evaluate the impacts of utility layouts with a preference for designs that allow for maximum tree retention AND maximum tree replacement with the largest possible tree species. Consolidating utilities in the same trench as was done in the High Point development can minimize site disturbance and maximize canopy and landscape options.
- **Shade reduction impacts to people:** People who rely public transportation can spend significant wait times outside and shade is an important resource. The current proposal appears to remove the trees at the southeast corner (NE 41st St & 42 Ave NE) near bus stop 29105. Losing shade resources disproportionately impacts those with lower incomes and those without cars who rely on public transportation. Shade loss and increased surface temperatures should be evaluated within the context of the greater area as well. We note that Seattle Children's Hospital expanded within the last ten years, increasing the amount of imperviousness and hardscaping in the vicinity, which likely impacts the local urban heat island effect.
- **Impact on homelessness, affordability, and gentrification:** The 2019 Point-in-Time count in Seattle County found over 11,000 people experiencing homelessness, approximately half of whom were living unsheltered in mostly public spaces (Applied Survey Research 2020). Homelessness has heavy human, societal, and environmental consequences. High housing costs in the city can push those with lower incomes to suburban or rural areas, exacerbating urban sprawl and associated climate impacts. Please evaluate alternatives on the impact they will have on homelessness, affordability, and gentrification. Does the project contribute to Mandatory Housing Affordability funds? Does it include income-restricted units? Does it ease the housing affordability crisis, encourage density, and contribute to a diverse community in Laurelhurst?

Potentially affected resources:

- **Urban Wildlife:** The birds, butterflies, bees, raccoons and other wildlife that visit our city are critical resources. Birds particularly so. They provide a daily point of contact with wildlife in Seattle unlike any other animal. The experiences birds provide in cities are increasingly important as fewer people, especially children, have experiences in "wild nature." Urban birds help urbanites connect with nature right in their own neighborhood. An individual's connection with nature is positively associated with pro-environmental behaviors (Rosa et al. 2018) and improved mental health (Bratman et al. 2012). Seattle Audubon cannot deliver on its mission without birds to drive the local connection to nature.
- **Urban Forest:** The most important thing we can do for our urban forest is to maintain the trees we already have now. Replacing big trees and the benefits they provide comes with a lag time of decades and we must protect small trees as well to serve as replacements for the big trees when they inevitably die. It is difficult to see how the removal of around 60% of trees on the site, as outlined in the original project plan, aligns with the City's stated goal to achieve 30% canopy cover

by 2037 and 40% over time (City of Seattle 2016). Current Seattle Municipal Codes (SMC 23 and SMC 25.11) expect that developers maximize tree retention and protection throughout the development process, beginning with platting.

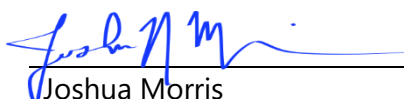
Range of Alternatives

- Evaluate designs that:
 - minimize footprint of development and imperviousness (build up rather than out).
 - minimize tree removal.
 - incorporate bird-safe building designs.
 - minimize traffic increases.
 - minimize shade loss at bus stop.
 - exclude turfed lawns and other "blandscaping."
 - incorporate green stormwater infrastructure.
 - consolidate location of utilities.
 - maximize tree replacement with largest possible tree species, with a preference for native conifers.
 - maximize affordable units.
 - allow for the daylighting of Yesler Creek.
 - maintain relative habitat connectivity with surrounding habitat patches and corridors.
 - make space for publicly accessible parks.
 - maintain a treed and vegetated buffer between any new development and surrounding area.
- Evaluate an alternative that repurposes existing buildings, does not expand the development footprint and does not alter the landscaping and other natural features on the site.

Mitigation Measures:

- Site design that maximizes retention and replacement of trees. A healthy urban forest depends on both age and species diversity of our trees. Big trees and groves tend to provide more benefits than smaller trees, but we must conserve smaller trees, too; they are future replacements for big old trees when those inevitably die.
- Trees and shrubs instead of lawns. Lawns and other forms of "blandscaping" tend to homogenize and reduce urban biodiversity. They also require fertilizers and other treatments that contribute to polluted waterways.

Sincerely,



Joshua Morris

Urban Conservation Manager



Deb Heiden

Chair, Conservation Committee

[References on following page]

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